

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

OCT 21 2020

JEFFREY P. ALLSTEADT, CLERK  
INTAKE 1

IN RE:	)	CHAPTER 11 PROCEEDING
	)	
	)	
JAMES SAMATAS	)	CASE NO. 20-BK-17355
	)	
	)	
DEBTOR	)	HON. A. BENJAMIN GOLDGAR

**NOTICE OF OBJECTION TO TRUSTEE'S MOTION TO SHORTEN NOTICE TO THAT GIVEN, AND TO CONVERT OR, IN THE ALTERNATIVE, DISMISS CHAPTER 11 CASE AND FOR OTHER RELIEF**

James Samatas, pro se, hereby objects to the Trustee's Motion and in support thereof states the following:

**DISCUSSION**

1. The Debtor commenced this Chapter 11 case, pro se, on September 21, 2020.
2. The Debtor filed along with his pro se Chapter 11 petition (i) a list of creditors, (ii) Schedule D, (iii) Form 104 – List of 20 Largest Unsecured Creditors, and (iv) Schedule E/F.
3. The Debtor has not filed any additional documents on a timely basis.
4. The Debtor held an initial conference telephonically with appointed Trustee and has further submitted required Debtor in Possession checking account and proof of Insurance with Notice to Trustee.
5. At inception of the case, Debtor received an offer for sale of a subject real estate asset (1424 Tanager Way, Los Angeles) that remained just short of being able to satisfy all creditors. Negotiations continued with several revisits, and at this juncture another higher offer is anticipated.
6. Debtor believed that a successful real estate sales contract was going to be entered into and would remain contingent upon this court's approval prior to requisite filing dates. The effort was pursued to mitigate time and expenses of this court and creditors if an sufficient contingent sales agreement was achieved.

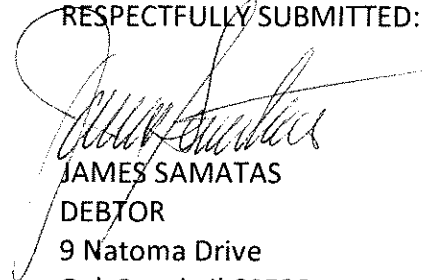
7. The prospective purchaser of the asset made a last visit on October 17, 2020 with the intent of determining the highest offer they were willing to make. This offer is still pending.
8. The Debtor communicated this information to David Holtkamp, US. Trustee on October 20, 2020.
9. The Debtor is committed to filing the requisite documents within a 14 day period, provided the Motions to Dismiss/Convert are duly denied and leave to file is granted.

### CONCLUSION

The Debtor requests that the Court accept the objection and basis thereon, and grant Debtor leave to file all timely required documents within 14 days hereof.

Dated. October 21, 2020

RESPECTFULLY SUBMITTED:



JAMES SAMATAS  
DEBTOR  
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